

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**ACCESS 4 ALL, INC. and
FELIX ESPOSITO,**

Plaintiffs,

v.

**DELANCY CLINTON ASSOCIATES,
L.P., a Pennsylvania Limited Partnership**

Defendant.

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**CIVIL ACTION NO.
04-12347 (MAP)**

JULY 24, 2006

**DEFENDANT'S MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFFS' VERIFIED APPLICATION FOR
ATTORNEYS' FEES, COSTS AND EXPERT'S FEES**

Defendant, DELANCY CLINTON ASSOCIATES respectfully requests an extension of time of 18 days, up to and including August 14, 2006, to file its response to Plaintiffs' Verified Application for Attorneys' Fees, Costs and Expert's Fees which is currently due on July 28, 2006. In support of this Motion, the Defendant states:

1. The Plaintiffs filed their Verified Application for Attorneys' Fees, Costs and Expert's Fees and Accompanying Memorandum of Law on July 7, 2006 with a subsequent filing on July 10, 2006.
2. Due to vacation schedules and other commitments, the undersigned has been unable to review Plaintiffs' Verified Application for Attorneys' Fees, Costs and Expert's Fees and Accompanying Memorandum of Law.

ORAL ARGUMENT NOT REQUESTED

3. Plaintiffs' counsel has been contact regarding this Motion, but the undersigned has not been able to ascertain Plaintiffs' counsel's position with respect to the Motion.
 4. This is Defendant's first request for an extension of time on this matter.
- Accordingly, Defendant respectfully requests that this Motion be granted.

DEFENDANT – DELANCY CLINTON
ASSOCIATES, L. P.

By: /s/ Michael Colgan Harrington
Michael Colgan Harrington -
#BBO565144
mharrington@murthalaw.com

Murtha Cullina LLP
CityPlace I
185 Asylum Street
Hartford, Connecticut 06103-3469
Telephone: (860) 240-6000
Fax: (860) 240-6150
Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on July 24, 2006, a copy of the foregoing Motion for Extension of Time to Respond to Plaintiffs' Verified Application for Attorneys' Fees, Costs and Expert's Fees was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System. A copy was also served to the following via first class mail:

John Fuller, Esq.
Fuller, Fuller and Associates, P.A.
12000 Biscayne Boulevard, Suite 609
North Miami, FL 33181

/s/ Michael Colgan Harrington
Michael Colgan Harrington
#BBO565144
mharrington@murthalaw.com

Murtha Cullina LLP
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Hartford, Connecticut 06103-3469
Telephone: (860) 240-6000
Fax: (860) 240-6150
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